## REMARKS

In the outstanding Office Action, claims 1, 9 and 17 were rejected under 35 U.S.C. §102(e) over BLACK et al. (U.S. Patent Application Publication No. 2004/0039800). Claims 2-8, 10-16 and 18-25 were rejected under 35 U.S.C. §103(a) over BLACK in view of SCHUNK et al. (U.S. Patent No. 6,980,515).

Initially, in reference to a statement at page 2 of the Office Action, Applicants note that the specification of the present utility application complies with 37 C.F.R. 1.77(b). That is, whereas 37 C.F.R. 1.77(b) suggests that the specification of a utility application "should" include the enumerated sections, 37 C.F.R. 1.77(b) does not require that the specification of a utility application include a Brief Summary of the Invention section. Furthermore, there is no statutory requirement that requires that the specification of a utility application include a Brief Summary of the Invention section.

Upon entry of the present amendment, claims 1-25 will have been amended to eliminate noted informalities, and to ensure that code segments recited in the claims are not limited to "source code segments" as previously recited. The herein-contained amendments should not be considered an indication as to Applicants' acquiescence as to the propriety of any outstanding rejection. Rather, the herein-contained amendments are presented to advance prosecution and obtain early allowance of claims in the present application.

Applicants traverse each of the outstanding rejections, for at least the reasons set forth below. In particular, BLACK does not disclose or suggest the combinations of features recited in claims 1, 9 and 17, and BLACK in view of SCHUNK does not disclose, suggest or render obvious the combinations recited in claims 2-8, 10-16 and 18-25. Accordingly, reconsideration

and withdrawal of each of the outstanding rejections is respectfully requested for at least the reasons set forth below.

Claim 1 recites *a method of managing connections between a Java 2 enterprise edition (J2EE) application server and a remote common object request broker architecture (CORBA) enterprise information system, comprising: integrating a resource adapter with the J2EE application server, the resource adapter comprising an encapsulated CORBA interface to the remote CORBA enterprise information system; and establishing a persistent CORBA connection between the J2EE application server and the remote CORBA enterprise information system.*

The Office Action asserts that BLACK discloses the features of claim 1 at columns [0060]-[0063] and in Figure 5B. However, the Office Action fails to specify which of the features of BLACK is believed to disclose each of the individual features of claim 1, including a Java 2 enterprise edition (J2EE) application server; a common object request broker architecture (CORBA) enterprise information system; an encapsulated CORBA interface to the CORBA enterprise information system; or a resource adapter comprising the encapsulated CORBA interface, each of which is recited in claim 1. The Office Action also fails to specify which of the features of BLACK is believed to disclose a persistent CORBA connection between the J2EE application server and the CORBA enterprise information system, as recited in claim 1. Insofar as each of the above-noted features is recited as a distinct feature of claim 1, the Office Action fails to establish a prima facie showing that the above-noted features of claim 1 are, in fact, disclosed by the features shown in Figure 5B of BLACK. Further, it is inappropriate for the Office Action to place a burden on Applicants to guess the interpretation of Figure 5B of BLACK intended in the Office Action.

Nevertheless, for the purposes of the present Response, Applicants will assume that the Office Action interprets the CORBA server 540a in BLACK as the claimed J2EE application server; and the CORBA client 115 as the CORBA enterprise information system. However, such an interpretation of BLACK is incorrect and, in any case, BLACK fails to disclose numerous additional features recited in claim 1 given an interpretation of BLACK as set forth above.

That is, the CORBA client 115 in BLACK is not a CORBA enterprise information system as the term would be understood by one of ordinary skill in the art. Rather, CORBA client 115 is a client implemented on a user workstation 110. An exemplary enterprise information system 480 and an exemplary enterprise information system archive 490 are disclosed in the embodiment shown in Figure 4 of the present application and, as should be clear, an enterprise information system is not disclosed by a CORBA client 115 implemented on a user workstation 110. Therefore, if the CORBA client 115 is BLACK is interpreted as a CORBA enterprise information system, Applicants respectfully request an explanation in the next Office Action as to how the term "enterprise information system" is understood and interpreted in the Office Action, as well as an explanation as to how CORBA client 115 in BLACK would be interpreted consistent with the understanding and interpretation of the term "enterprise information system" in the Office Action.

In any case, BLACK also fails to disclose additional features recited in the combination of claim 1. In this regard, Figure 5B in BLACK is directed to a CORBA server 540a which services a request from CORBA client 115. Although the CORBA server 540a is compliant with the J2EE specification according to paragraph [0063] of BLACK, the CORBA server 540a is not then integrated with a "resource adapter comprising an encapsulated CORBA interface". Additionally, if

the CORBA server 540a were interpreted as the resource adapter that includes an encapsulated CORBA interface, than nothing else in BLACK could be interpreted as a J2EE server integrated with the CORBA server 540a interpreted as the resource adapter.

Moreover, no connection between the CORBA client 115 and the CORBA server 540a in BLACK is a "persistent" connection. Rather, at 572, the CORBA client 115 issues a request to the CORBA server 540a in BLACK, but BLACK does not disclose that the request from CORBA client 115 is issued over a "persistent" CORBA connection.

As described above, the Office Action fails to specify which of the features of BLACK is believed to disclose numerous of the specific features recited in claim 1, including a Java 2 enterprise edition (J2EE) application server; a common object request broker architecture (CORBA) enterprise information system; an encapsulated CORBA interface to the CORBA enterprise information system; a resource adapter comprising the encapsulated CORBA interface; or a persistent CORBA connection between the J2EE application server and the CORBA enterprise information system. However, as also set forth above, there is no proper interpretation of the features relating to Figure 5B in BLACK as disclosing the combination of features recited in claim 1. Accordingly, reconsideration and withdrawal of the rejection of claim 1 over BLACK is respectfully requested. Moreover, if the rejection of claim 1 over BLACK is maintained in a subsequent Office Action, Applicants request an explanation with specificity as to how the numerous features shown in Figure 5B of BLACK are interpreted as disclosing the above-noted features of claim 1.

As described above, BLACK also does not disclose the computer readable medium of claim 9. That is, BLACK does not disclose a resource adapter or a code segment that integrates the resource adapter with a J2EE application server. BLACK also does not disclose a CORBA enterprise information system or any resource adapter that includes an encapsulated CORBA interface to the remote CORBA enterprise information system. Further, BLACK does not disclose any persistent CORBA connection establishing code segment that establishes a persistent CORBA connection between the J2EE application server and the remote CORBA enterprise information system.

Further, as set forth above, the outstanding Office Action fails to explain which features of BLACK are believed to disclose the various features recited in claim 9, including a resource adapter, a J2EE application server, a CORBA enterprise information system, an encapsulated CORBA interface, or a "persistent" CORBA connection. However, as also set forth above, there is no proper interpretation of the features relating to Figure 5B in BLACK as disclosing the combination of features recited in claim 9. Accordingly, reconsideration and withdrawal of the rejection of claim 9 over BLACK is respectfully requested. Additionally, if the rejection of claim 9 over BLACK is maintained in a subsequent Office Action, Applicants request an explanation with specificity as to how the numerous features shown in Figure 5B of BLACK are interpreted as disclosing the above-noted features of claim 9.

Finally, as described above, BLACK does not disclose a Java 2 enterprise edition (J2EE) compliant application server as recited in claim 17. That is, BLACK does not disclose a resource adapter or a J2EE compliant application server that hosts the resource adapter. BLACK also does

not disclose a CORBA enterprise information system or any resource adapter that includes an encapsulated CORBA interface to the CORBA enterprise information system. Additionally, BLACK does not disclose a processor that implements a customized deployment descriptor for deploying the resource adapter. Further, BLACK does not disclose a persistent CORBA connection between the J2EE application server and an remote CORBA enterprise information system.

Further, as set forth above, the outstanding Office Action fails to explain which features of BLACK are believed to disclose the various features recited in claim 17, including a resource adapter, a J2EE compliant application server, a CORBA enterprise information system, an encapsulated CORBA interface, or a "persistent" CORBA connection. However, as also set forth above, there is no proper interpretation of the features relating to Figure 5B in BLACK as disclosing the combination of features recited in claim 17. Accordingly, reconsideration and withdrawal of the rejection of claim 17 over BLACK is respectfully requested. Additionally, if the rejection of claim 17 over BLACK is maintained in a subsequent Office Action, Applicants request an explanation with specificity as to how the numerous features shown in Figure 5B of BLACK are interpreted as disclosing the above-noted features of claim 17.

As described above, BLACK does not disclose numerous of the individual features of the pending independent claims which are rejected under 35 U.S.C. §102 over BLACK. Accordingly, claims 1, 9 and 17 are allowable over BLACK under 35 U.S.C. §102. Further, it would not be obvious under 35 U.S.C. §103 to modify BLACK to obtain the features recited in claims 1, 9 and 17 and, in any case, the Office Action does not apply any other document as disclosing the features recited in claims 1, 9 and 17, or even assert that it would be obvious to
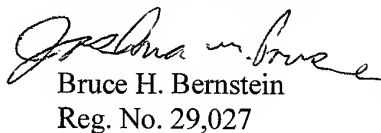
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modify BLACK to obtain the features recited in claims 1, 9 and 17. Finally, claims 2-8, 10-16

and 18-25 are allowable at least for depending, directly or indirectly, from an allowable

independent claim, as well as for additional reasons related to their own recitations.

Accordingly, reconsideration and withdrawal of the outstanding rejections of claims 1, 9 and 17

under 35 U.S.C. §102 over BLACK and claims 2-8, 10-16 and 18-25 under 35 U.S.C. §103 over

BLACK in view of SCHUNK is respectfully requested.

Should there be any questions or comments, the Examiner is invited to contact the

undersigned at the below-listed telephone number.

Respectfully submitted,
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